

EXHIBIT 2

**(NCGP Response to NCSBE Investigator David Richards –
June 16, 2022)**

Questions from State Board of Elections Investigator David Richards, with Answers in Bold from NCGP Officers

Hello Mr. Ndege,

Q: I hope you are well. We would like to meet in person, so we can go over the petitions that have been submitted by your canvassers.

- **How many signatures are in question by the State Board? Can the SBoE scan the petitions in question and send them to us to expedite the process?**
- **Is it necessary to meet in person? Our officers are in different parts of the state. If a meeting is mandatory can we meet on Zoom? That way our legal counsel Oliver Hall can be there.**
- **Regarding the term “your canvassers” in the State Board’s question – there could be any number of people who submitted signatures to the county boards of election and/or to the NCGP whom we haven’t been in direct touch with. Any person can collect signatures and/or submit signatures to the boards, not just “canvassers” whom the NCGP trains in petitioning. For instance, in Wake County alone there were over 450 formerly registered Greens to whom we mailed the petition sheet to ask them to sign it and to collect some additional signatures; we texted about 4,500 of our contacts to ask them to petition; and we called about 3,000 of our contacts on the phone to ask them to petition. As a result of these texts and phone calls, we mailed out hundreds of envelopes to our contacts who indicated they wanted to sign the petition and/or collect signatures. These mailings included instructions and/or links to instructions on the NCGP website, as well as a link to download the blank petition sheet from the NCGP website, both of which are still available at www.ncgreenparty.org/petition.**

Q: As part of the process when we meet we would like a list of all the canvassers and the firm that the Green Party contracted with to conduct the petition drive.

We retained 28 petitioners, in our estimation, as trained, regular volunteers who are NCGP members or nonmember supporters who we know collected signatures. We retained 16 petitioners, in our estimation, as trained, regular petitioners who were paid stipends by either NCGP or the Matthew Hoh for Senate campaign (MH4S), or both, who are NCGP members or nonmember supporters who we know collected signatures. Additionally, NCGP and MH4S contracted with a petitioning firm, First Choice, which collected about 60 total signatures for us, about half of which were collected incorrectly (voters registered in various counties who signed the same sheet) and thus of no value, and then NCGP and MH4S ended that contract after the firm wasn’t able to deliver more signatures. NCGP and MH4S canceled our contract with First Choice, and each party was issued a full refund from First Choice. The refund to NCGP can be seen in the NCGP’s 2022 first-quarter financial report in the expenditures section at <https://cf.ncsbe.gov/CFOrgLkup/ReportDetail/?RID=197127&TP=REC>. NCGP and MH4S then contracted another firm, Evans Political Consulting, that collected several hundred signatures for us from three regular subcontractors. The firm’s principal, Mr. Lee Evans, had difficulty

recruiting petitioners and eventually canceled our contract on his own initiative. Evans provided a partial refund of our fees. Upon cancellation of the contract, Mr. Evans further suggested that we should consider contracting directly with his three subcontractors so they could continue their work, and MH4S did so for a short period from May 11 to the afternoon of May 17.

Q: We would like to know what type of training was provided by the Green Party and what areas (grocery stores, malls, private residences, etc.) the canvassers were told to go to obtain signatures of voters.

- NCGP provided thorough written and visual instructions, posted on the NCGP website and elsewhere, as well as weekly Zoom training sessions and in-person training. The instructions—written, visual, and oral—outlined the key petitioning requirements in state law.
- To untrained petitioners, NCGP suggested that petitioners sign the petition if registered to vote and collect signatures from friends and family if registered to vote.
- To trained petitioners, the NCGP suggested that petitioners collect signatures from registered voters at festivals and outside DMVs, public libraries, universities, rallies and demonstrations, parades, Earth Day events, and other large events on public property, and public parks, as well as outside polling precincts during Early Voting and Election and Primary Days in compliance with state law for canvassing outside voting precincts.
- NCGP emphasized to all petitioners the need to comply with all legal requirements during the petitioning process and to exercise diligence to ensure, to the extent possible, that they collected valid signatures.

We would like to know what questions canvassers asked the voters while attempting to get signatures and what process the Green Party used to verify that the voters were registered to vote in NC.

- The primary questions the NCGP instructed petitioners to ask potential signers upfront were
 1. would the person like to sign the petition to put the NCGP on the ballot,
 2. is the person registered to vote in North Carolina, and
 3. if the person is registered to vote in North Carolina, then (a) in which county is the person registered to vote, and (b) at what address in that county is the person registered to vote.

The signer was then given a petition sheet specific to their county and asked to provide their printed name, address, date of birth, and signature on the petition.

- To our knowledge, there are no means for NCGP to verify that petition signers are registered to vote in North Carolina except by looking up signers one by one via the State Board's voter search tool, which would be a near impossible task given the time constraints of our petition drive. To the best of our knowledge, there is no legal requirement that NCGP verify each voter's registration. Additionally, it should be noted that in the absence of our petition signatures being returned to us by the county boards of election continually within the 14-day timeframe as directed by state statute §163-96, we weren't able to adequately review signatures rejected by the county boards to detect patterns that might have raised concerns.

In order to move this along and expedite the process we would need your full cooperation in this matter.
Thank you very much and take care.

David Richards

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Investigator

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